

EXHIBIT C

January 21, 2021

VIDEO TELECONFERENCE DEPOSITION
CHRISTINA BIFULCO

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICHELO, et al.,
BIFULCO, et al.,

Plaintiffs,

- vs - Case No.
18 Civ. 1781
18 Civ. 7692

NATIONAL COLLEGIATE STUDENT
LOAN TRUST 2007-2, et al.,
NATIONAL COLLEGIATE STUDENT
LOAN TRUST 2004-2, et al.,

Defendants.

Video teleconference deposition of
CHRISTINA BIFULCO, Plaintiff, present at JACK W.
HUNT & ASSOCIATES, INC., 1120 Liberty Building,
Buffalo, New York, taken pursuant to the Federal
Rules of Civil Procedure and Executive Order No.

2.7, Section 29-a of Article 2-B, connecting to
various locations on January 21, 2021, commencing
at 10:06 a.m., before LORI K. BECK, CSR, CM, Notary
Public.

1 seconds here.

2 Q. Take your time.

3 MR. HAWKINS: Greg, did you put your dog on
4 that fax cover sheet? Is that what happened?

5 MR. CASAMENTO: No. No, no, not me.

6 THE WITNESS: Okay. The question again,
7 please? I'm sorry.

8 BY MR. CASAMENTO:

9 Q. The question is how you became aware of
10 the state court action.

11 A. I don't remember.

12 Q. All right. With respect to
13 Interrogatory Number 10, there are two reasons
14 listed for why you did not appear in the state
15 court action. Do you see that, 1 and 2?

16 A. Yes, sir.

17 Q. Do those pertain to you? Meaning
18 number 1 says: Did not have the time or money to
19 obtain legal advice upon learning of the state
20 court actions.

21 Does that pertain to you?

22 A. Yes, sir.

23 Q. How about number 2? Does that also
24 pertain to you?

25 A. Would you scroll up, please?

1 Q. Absolutely. Please scroll up, Andrew.

2 A. Yes, sir, that is true.

3 Q. Well, what did you do when you became
4 aware of the state court action? What action did
5 you take?

6 A. Nothing. What could I? What could I?

7 Q. Did you reach out to -- to the Court to
8 see if there was anyone who could assist you at the
9 court?

10 A. No, sir.

11 Q. Did you talk to your son about it?

12 A. No, sir.

13 Q. Okay. Interrogatory Number 11 -- well,
14 why not? Why didn't you do that? Why didn't you
15 talk to your son about it, at least, right?

16 The loan pertained to him, didn't it?

17 A. Yes, sir.

18 MR. HAWKINS: Objection.

19 THE WITNESS: It did.

20 BY MR. CASAMENTO:

21 Q. You can answer.

22 A. Supposedly.

23 Go ahead. What was the question again,
24 please?

25 Q. I said why didn't you discuss it with